

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Case No. 23-34815 (JPN)
GALLERIA 2425 OWNER, LLC	§	
	§	Chapter 11
Debtor.	§	

**NBK’S SUPPLEMENT AND REPLY TO NBK’S EMERGENCY MOTIONS TO  
ENFORCE SALE ORDER AND REQUEST FOR CONTINUANCE**

TO THE HONORABLE JEFFREY P. NORMAN,  
UNITED STATES BANKRUPTCY JUDGE:

National Bank of Kuwait, S.A.K.P., New York Branch (“NBK”), for itself and Houston 2425 Galleria, LLC (“NBK’s Assignee”), supplements its Emergency Motions to Enforce Sale Order (collectively, the “Motions”) [ECF Nos. 838 and 839] and replies to Jetall Companies, Inc. (“Jetall”) and 2425 WL, LLC’s (“2425 WL”) Combined Response to NBK’s Emergency Motions to Enforce Sale Order and Request for Continuance [ECF No. 848] (“Jetall Response”) to address one specific issue as set forth below before the emergency hearing on the Motions scheduled for tomorrow, December 5, 2024 at 9:00 a.m. (CT). NBK does not believe that a reply to the Jetall Response is otherwise warranted, beyond that which it will address at the hearing. Unless otherwise defined in this pleading, capitalized terms have the meanings ascribed to them in the Motions.

1. In the Motions, which were filed on December 2, 2024, NBK updated the Court on efforts by NBK’s Assignee to obtain clarification from the JP Court regarding its October 29, 2024 order disqualifying Jackson Walker LLP in a dispute with Jetall before the JP Court in Cause No. 241100353166, Justice of the Peace Court, Harris County, Texas, Precinct 1 Place 1 (“JP Court”), *Houston 2425 Galleria, LLC v. Jetall Companies, Inc.* (the “October 29 Disqualification Order”).

Jetall and its affiliates contended (wrongly) that the October 29 Disqualification Order also disqualified Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”) from representing parties adverse to Jetall and its affiliates in any matter in any court, including representing NBK and NBK’s Assignee in this Court or in the United States District Court for the Southern District of Texas. As of the filing of the Motions on December 2, 2024, NBK’s Assignee had not received any indication that the JP Court would address the issue of clarification.

2. On the afternoon of December 4, 2024, NBK’s Assignee received a signed Amended Order of Disqualification attached as Exhibit A, entered on December 4, 2024 by the JP Court, which amends the October 29 Disqualification Order (“Amended Disqualification Order”).

3. Among other things, the Amended Disqualification Order holds that (i) “there was no allegation by the Defendant (Jetall) in its motion to disqualify, or any evidence adduced at the Hearing, with respect to Pillsbury” and (ii) the JP Court’s disqualification of Jackson Walker, LLP on October 29, 2024 “does not extend to Pillsbury or any other law firm.” *See* Exhibit A.

### **CONCLUSION**

Given the centrality of unfounded claims that Pillsbury was or should be disqualified, NBK for itself and NBK’s Assignee chose to bring the entry of the Amended Disqualification Order to the Court’s attention to eliminate the need to even consider the allegations about disqualification when considering the Motions, which the Court should grant for the reasons stated therein.

DATED: December 4, 2024

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**CERTIFICATE OF SERVICE**

I certify that, on December 4, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and to the following parties via email:

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